

SITE ASSESSMENT REPORT FOR

HOFFMAN LANDFILL ROCKFALLS, WHITESIDE COUNTY, ILLINOIS

TDD: T05-9308-023 PAN: EIL0809SAA

NOVEMBER 15, 1993

Reviewed by:

Approved by:

Date: 11/15-93

Date: 11/15-93

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#### 1.0 INTRODUCTION:

The Ecology and Environment, Inc. (E & E) Technical Assistance Team (TAT) was tasked by the Emergency and Enforcement Response Branch (EERB) of the United States Environmental Protection Agency (U.S. EPA) on August 24, 1993, under Technical Direction Document T05-9308-023 to conduct a site assessment (SA) of Hoffman Landfill (HL) site and evaluate threats to human health and environment.

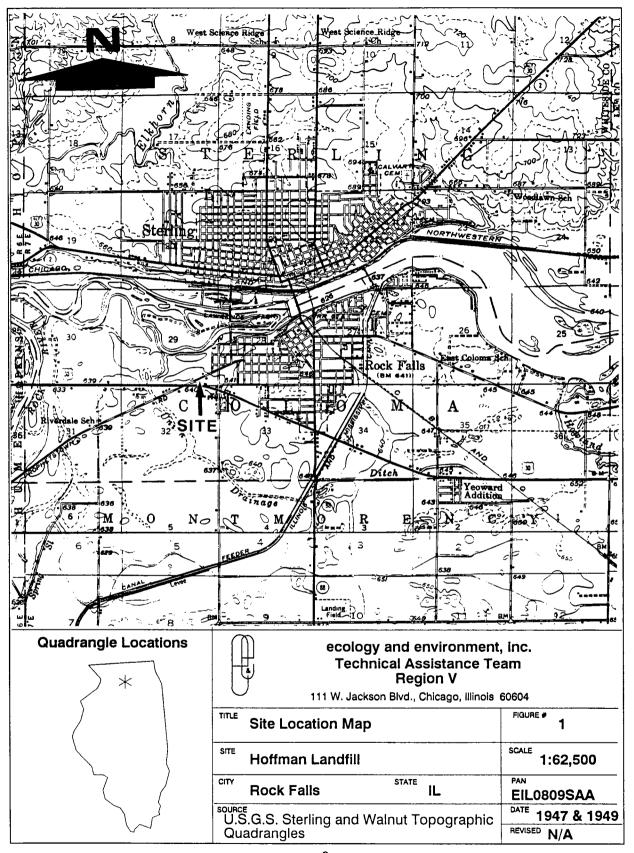
The HL site is located in Rock Falls, Whiteside County, Illinois and is legally described as within 1/4 SE of 1/4 SW of 1/4 SE of Section 29, T.21 N, R 7E (Figure 1 - Site Location Map).

#### 2.0 SITE BACKGROUND:

The site was referred to U.S. EPA by the ARCS subcontractor, who at the time of reporting, was conducting monitoring well sampling of Hoffman Landfill. The ARCS subcontractor noticed the tanks and drums near Advanced Asphalt Company located adjacent to the landfill and determined them to be in a position to pose an environmental threat.

### 3.0 SITE ACTIVITIES:

TAT members R. Nagam, J. Sherrard, and Y. Anderson conducted the site assessment (SA) along with On-Scene Coordinator (OSC) Paul Steadman on August 25, 1993 . Henry Hoffman, the property owner of Hoffman Landfill was present on the site, and showed the location of drums and tanks near the eastern border of Hoffman Landfill. This location, which is an open area east of HL area is currently leased to Advanced Asphalt Company (AAC) by Henry Hoffman. AAC is an active facility dealing with the manufacture of Asphalt. Hoffman, upon OSCs request, had given the name of Bradley Bruins, as the contact person for AAC and also volunteered to inform Bruins of U.S. EPA's ongoing site assessment. After calibrating photo ionization detector (PID) and oxygen/explosimeter, the TAT and OSC started site reconnaissance. AAC is bordered on the north and west by Hoffman Landfill, on the south by a pond and agricultural land, and on the east by a dirt road leading to Anixter Road. Hoffman's property, which includes the landfill and AAC area, is fenced and access controlled by a gate on Anixter Road. During this site assessment, Bradley Bruins, Superintendent of AAC came and spoke with OSC Paul Several 55-gallon metal drums were observed on AAC Steadman. leased property. Most of these drums were either empty or contained material in small quantities. A total of seven (7) horizontal and two (2) vertical tanks were observed in this All the seven (7) horizontal tanks appeared to be nonoperational and in a moderate to poor condition. The tank on



the northwest side of AAC (Tank#1) contained black asphaltlike material at its bottom. During this SA, TAT labelled all the twenty one (21) drums found on the location. (7) of these drums contained small quantities of material while the rest of the fourteen (14) drums were observed to be empty. One of the seven drums had a label of hydraulic oil, while a second drum had a label of diesel oil. per OSCs request, had agreed to reclaim these two drums. Bruins indicated that the two vertical tanks (mentioned previously) belonged to AAC. He had also informed the OSC that the horizontal tanks at this location were present from last 20 years. In close proximity to the two vertical tanks, twelve (12) black, 55-gallon metal drums and three (3) gallon metal drums were present (Figure 2 - Site Features Map). These were identified by Bruins as belonging to AAC and provided the OSC with material safety data sheets (MSDS) of the drum contents. The MSDS information indicated that the drum material contained trichloroethane, perchloroethylene, and other solvents. PID reading on Tank#1 indicated 18 parts per million (ppm) of organic atmosphere. Another horizontal tank appeared empty but indicated a PID reading of 5 ppm.

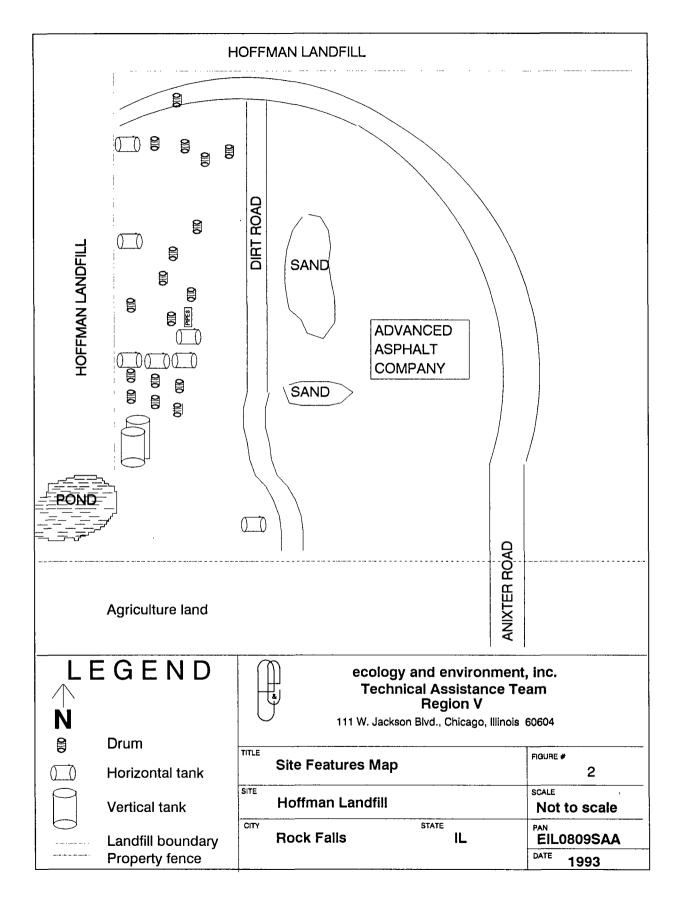
After this site reconnaissance, TAT made preparations for sampling the drums. Most of the seven drums identified earlier appeared to contain small quantities of rain water mixed with oily material. Due to the nature of the drum contents and their volume, no samples were taken during this SA. Tank#1 sample could not be collected because of the small amount of material at its bottom.

Based on drum and tank locations, and the similarity of drum and tank contents to AACs raw materials and product, OSC had requested Bruins to take actions to abate threats posed by the deteriorating tank and drums within ten (10) days. Bruins had indicated that they will empty Tank#1 and the seven drums and send them to a fuels blender.

During this SA, TAT photographed the features of the site, which are included in Appendix A. All potentially contaminated equipment was bagged and taken with TAT for proper disposal. No samples were collected during this site assessment. After these site activities, TAT demobilized from the site.

#### 4.0 DISCUSSION OF POTENTIAL THREATS:

MSDS for the tar binder indicates that it contains hazardous chemicals like trichloroethane, perchloroethylene, and other solvents. Tanks and drums containing tar binder and other material stored in an improper manner posed a potential threat to public health and the environment if such materials



were released to the ground and the environment.

### 4.1 THREAT TO HUMAN HEALTH AND ENVIRONMENT:

Conditions at Hoffman Landfill site that warranted an appropriate action as set forth in paragraph (b) (2) of section 300.415 of the National Contingency Plan (NCP) are:

(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:

Drums containing trichloroethane, perchloroethylene, and other hazardous solvents were stored improperly and in a manner that posed exposure threats to people working on the site.

(ii) Weather conditions that may cause hazardous substances to migrate or be released.

Some of the drums and tanks were in poor and deteriorating condition. These tanks and drums which were stored outside without any protection from inclement weather posed potential migration threats under severe weather conditions.

### 5.0 U.S. EPA ACTION

Paragraph (a) (2) of section 300.415 of the National Contingency Plan (NCP) as applicable to Hoffman Landfill is:

"Where the responsible parties are known, an effort initially shall be made, to the extent practicable, to determine whether they can and will perform the necessary removal action promptly and properly"

Based on drum and tank locations, and the similarity of drum and tank contents to AACs raw materials and product, OSC had verbally notified Bruins during the SA to abate threats posed by the deteriorating tank and drums within ten (10) days. Bruins had indicated that they will empty Tank#1 and the seven drums and send them to a fuels blender.

On August 27, 1993, OSC Steadman mailed letters to Bradley Bruins, Superintendent of AAC, and Henry Hoffman, property lessor to AAC, reiterating their agreement during the SA, to take appropriate steps within ten (10) days to ensure that the waste materials are removed from the site and properly disposed of (Appendix B). OSC in this letter had also suggested that the twelve (12) black 55-gallon "tar binder" drums of AAC be moved to a location where they will not create a serious hazard to the environment.

On September 30, 1993, OSC Steadman received a fax of the Safety Kleen's receipt sent by Bruins. This receipt indicated the pick-up of 1,000 gallons of used oil from AAC by Safety Kleen Corporation.

On October 19, 1993 OSC Steadman received a letter from Bruins of Advanced Asphalt Company, and three (3) photographs of the site's current conditions. The letter itemizes and attests to efforts made by the potential responsible party (PRP) to improve the sites appearance and conditions.

## 6.0 RECOMMENDATIONS:

Actions taken by Advanced Asphalt Company, pursuant to OSC Steadman's suggestion, have effectively mitigated potential threats due to hazardous chemicals present in drums and tanks.

## APPENDIX A PHOTO DOCUMENTATION



Site: Hoffman Landfill TDD:T05-9308-023 PAN:EIL0809SAA Di Date:8/25/93 Time:0919 Weather:Cloudy, 70 F Photo by:J.She Comments: View of 55-gallon drums and the metal tank Site: Hoffman Landfill IDD:105-9308-023 PAN:EIL0809SAA Dir:Date:8/25/93 Time:0922 Weather:Cloudy, 70 F Photo by:J.Sherr Comments: View of two vertical metal tanks that are used Advanced Asphalt Company for the manufacture of Asphalt.



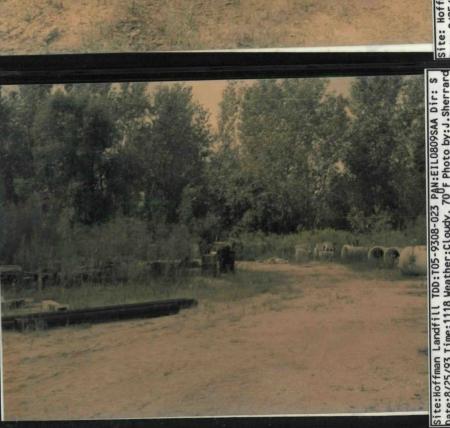
Site:Hoffman Landfill TDD:T05-9308-023 PAN:EIL0809SAA Dir: S Date:8/25/93 Time:1117 Weather:Cloudy, 70 F Photo by:J.Sherrard Comments: View of some empty 55-gallon drums located near Advanced Asphalt Company.





Site: Hoffman Landfill TDD:T05-9308-023 PAN:EIL0809SAA Dir: WDate:8/25/93 Time:1118 Weather:Cloudy, 70 F Photo by:J.Sherrard Comments: Photo showing twelve (12) black 55-gallon metal drums that appeared to have asphalt in them. Site:Hoffman Landfill TDD:T05-9308-023 PAN:EIL0809SAA Dir: W Date:8/25/93 Time:1118 Weather:Cloudy, 70<sup>0</sup>f Photo by:J.Sherrard

Comments: A closer view of four (4) horizontal tanks, several pipes, and tires located on the east side of Hoffman Landfill.



Site:Hoffman Landfill TDD:T05-9308-023 PAN:EIL0809SAA Dir: S Date:8/25/93 Time:1118 Weather:Cloudy, 70 F Photo by:J.Sherrard Comments: Photo of some more empty 55-gallon drums located south of vertical tanks.



Site: Hoffman Landfill TDD:T05-9308-023 PAN:EIL0809SAA Dir: S Date:8/25/93 Time:1119 Weather:Cloudy, 70 F Photo by:J.Sherrard Comments: View of two orange/yellow metal 55-gallon drums Labelled RC-70, that belong to Advanced Asphalt Company.



Site:Hoffman Landfill TDD:105-9308-023 PAN:EIL0809SAA Dir: SE Date:8/25/93 Time:1119 Weather:Cloudy, 70 F Photo by:J.Sherrard Comments: Photo of an empty horizontal tank located in the bushes of Advanced Asphalt Company.





# APPENDIX B U.S. EPA LETTER TO PRP's



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

AUG 27 1993

REPLY TO THE ATTENTION OF:

HSE-5J

Mr. Brad Bruns, Superintendent Advanced Asphalt Company P.O. Box 234 Princeton, Illinois 61356

#### AND

Mr. Henry Hoffman, Property Lessor 709 Hoffman Drive Rock Falls, Illinois 61701

Dear Mr. Bruns and Mr. Hoffman:

RE: Disposition of Potentially Hazardous Waste Materials Stored at the Henry Hoffman Landfill/Associated Asphalt Company Property in Rock Falls, Whiteside County, Illinois

CERCLIS Site ID No.

During the conduct of this Agency's removal site assessment of the referenced property off Anixter Road in Rock Falls (legally described as within the SE 1/4 of Section 29, T21N, R78E) on Wednesday, August 25, 1993, it was determined that an accumulation of potentially hazardous substances containing trichloroethane, perchloroethylene and other solvents have been improperly stored on this site. Such improper storage can result in an imminent threat to the public health and the environment if such materials are released to the ground and surrounding area.

I met with both of you during this assessment and it was agreed that you would take appropriate steps within ten (10) days to ensure that these waste materials are removed from the site and properly disposed.

This refers especially to the contents of the tank marked as T-1, and the drums marked D-1, D-4, D-5, D-6, D-7, D-10 and D-11. As well, the off spec material referred to as "tar binder" in the 12 55-gallon capacity drums would be moved to a location where they will not create a serious hazard to the environment from a potential release or be confused with hazardous waste materials.

When the above steps have been taken, please notify this Agency in writing at the above address identifying the disposal facility (fuel recycler or fuel blender ?), the waste materials that were taken and the location.

We appreciate your cooperation in this matter. If you have any questions, please call me at telephone number 312/353-7615.

Sincerely,

Paul R. Steadman,

On-Scene Coordinator

Emergency and Enforcement Response Branch

cc: Office of Regional Counsel - EPA Reg. V

R.C. Karl, EERB Chief, Reg. V

M.E. Gustafson, Response Section III Chief A. Altur, Illinois Site Assessments Section

# APPENDIX C DISPOSAL LETTER FAX

Box 234



August 30, 1993

U.S. Environmental Protection Agency Region V, Emergency Response Branch 77 W. Jackson Blvd. HSE-5J Chicago, Ellinois 60604

ATTENTION: Mr. Paul R. Steadman, M.P.H.

Dear Paul,

You will find enclosed a copy of the receipt from Safety-Kleen Corp. for used oil picked up at our Rock Falls, Illinois asphalt plant facility.

Once again, I would like to thank you for your help in this matter.

Very truly yours,

ADVANCED ASPHALT CO.

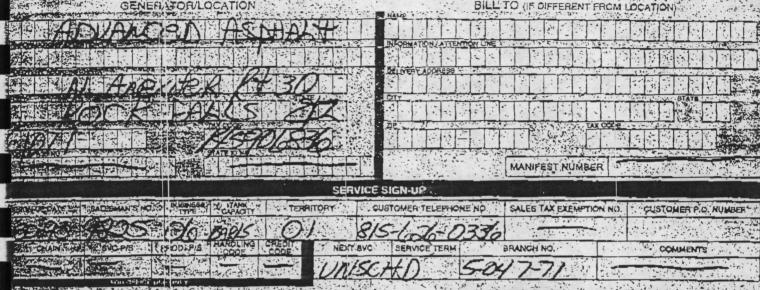
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Bradley J. Bruins

BJB:lf

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# APPENDIX D PRP'S LETTER OF CORRECTIVE ACTIONS



October 19, 1993

U.S. Environmental Protection Agency Region V, Emergency Response Branch 77 W. Jackson Blvd. HSE-5J Chicago, Illinois 60604

ATTENTION: Mr. Paul R. Steadman, M.P.H.

Dear Paul,

Since your visit to our plant site in late August, we have taken the following precautions as per your advice.

- 1. All tanks and drums which contained fuel oil were pumped out by Safety Kleen Corp. of Elgin, Illinois.
- 2. All tanks and drums with the exception of one tank have been removed from our property and sold as scrap.
- 3. The drums containing an asphalt anti-strip additive have been grouped together and covered with a tarp. (See enclosed pictures.)

Should you need any further information, please contact me.

Very truly yours,

ADVANCED ASPHALT CO.

Draa Brunsf.

Bradley J. Bruins

BJB:1f